

Appl. No. 09/930,115
Client Ref. 50P4410.01
Docket No. 020699-004800US

Date: February 27, 2008

Appl. No. : 09/930,115
Applicant : SAMRA, et al.
Filed : August 14, 2001
Title : USER INTERFACE FOR A DIGITAL PRODUCTION SYSTEM
INCLUDING MULTIPLE WINDOW VIEWING AND
NAVIGATING
TC/A.U. : 2672
Examiner : BRIER, JEFFREY A
Docket No. : 020699-004800US (50P4410.01)
Conf. No. : 9996

Mail Stop Appeal Brief - Patents
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REPLY BRIEF

Status of Claims

Claims 21-24 are pending in the present application. Claims 1-20 have been cancelled. Claims 21-24 are on appeal.

Grounds of Rejection to be Reviewed on Appeal

1. Whether claims 22 and 23 are unpatentable under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that applicants regard as the invention.

2. Whether claims 21-24 are unpatentable under 35 U.S.C. §103(a) over Hama et al (U.S. Patent No. 4,751,507, hereinafter “Hama”), in view of IBM technical disclosure bulletin and further in view of Mederer et al (U.S. Patent No. 5,864,782, hereinafter “Mederer”).

Argument

In discussing claim 21, the Answer on page 7 states that Mederer teaches displaying only the nodes in the flowgraph when the flowgraph is very large and that figs. 2 and 3 teach displaying lines between nodes of the flowgraph when a few nodes are displayed. Mederer states that a graphical representation for informational elements shown in Fig. 3 or a graphical representation shown in Fig. 2 may be displayed in graphic module 26. See Mederer, col. 5, lines 39-41, and col. 6, lines 33-36. In Fig. 1 a picture of a computer 28 is shown in box 26 and a positioning module showing part of the display screen is also shown in 24. Figure 1 includes circles or dots in the display screen shown. Although these circles or dots are shown, Mederer does not disclose or suggest that the graphical representation of Figures 2 or 3 is what is shown in Figure 1. Applicants submit that a graphical representation if displayed in computer 28 will be shown in graphic module 26 as is depicted in Fig. 2 or Fig. 3. Nowhere in Mederer is it described that the dots shown in Fig. 1 are a graphic representation of Figure 2 or Figure 3 without lines. That is, Mederer does not disclose or suggest that the graphic representation of Fig. 2 or Fig. 3 should be shown without lines.

The Answer also states that Figure 1 teaches displaying only the nodes in the flowgraph when the flowgraph is very large and Figures 2 and 3 teach displaying the lines between the nodes in the flowgraph when a few nodes are displayed. Applicants submit that the number of nodes in Fig. 1 is not very large as compared to the nodes in Figures 2 and 3. In fact, the number of nodes in Fig. 3 is significantly larger than the number of nodes in Fig. 1. However, Fig. 3 includes lines displayed. Thus, applicants submit that Mederer does not teach that only nodes are displayed when a flowgraph is very large. The reasoning used by the Examiner is flawed and Mederer actually teaches against what the Examiner states. The flowgraph shown in Figure 1 without lines is a smaller flowgraph with fewer nodes than what is shown in Figures 2 and 3.

The Answer then goes on to state that it would have been obvious to display in the navigator box an image of the flowgraph where the flowgraph does not show the lines interconnecting the nodes because displaying a large flowgraph in a small area of the

display with the lines will make the nodes of the flowgraph indiscernible. The Answer states that displaying an entire large flowgraph in a small area display with lines will make the nodes of the flowgraph indiscernible from other nodes and lines. The Answer did not cite any reference to this concept in Hama, Mederer, or IBM. In fact, the references teach against this concept. IBM discloses that a scroll bar is used to allow a user to scroll through different areas of a flowchart. Thus, IBM discloses displaying a whole image and allowing scrolling to parts not displayed. Hama discloses an image where lines are included. Also, Mederer does not disclose displaying nodes without lines and as discussed above, the reasoning about displaying no lines with nodes in a large flowgraph was not disclosed or suggested by Mederer because the number of nodes in Fig. 1 is not larger than that in Fig. 3.

Further, claim 21 states that display of the lines interconnecting the plurality of nodes in the flowgraph are omitted within the inner box and the navigator box while lines interconnecting the first set of nodes are displayed in a section of the display screen. The Answer still has not shown where lines interconnecting the nodes have been omitted while lines interconnecting a first set of nodes are displayed in a section of the display screen. The Answer points to the reasoning of displaying a large flowgraph in a small area will make the lines indiscernible. However, this reasoning is not taught by any of the cited references. Further, Mederer does not teach a version of Fig. 2 or Fig. 3 that is shown without lines concurrently with a version without lines. Rather, Fig. 2 and Fig. 3 are shown with lines. The nodes in Fig. 1 do not include lines but a teaching to display a flowgraph with interconnecting lines and without interconnecting lines on the same display is not disclosed or suggested. In addition, Hama discloses only displaying lines and Mederer discloses only displaying lines or only not displaying lines.

Accordingly, applicants submit that the combination of Hama, Mederer, and IBM do not teach or suggest every element of claim 21. Applicants submit that claim 24 should be allowable for at least a similar rationale as discussed with respect to claim 21. Claims 22 and 23 depend from claim 21 and thus derive patentability at least therefrom.

Respectfully submitted,

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